INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

(317) 232-8603
(800) 451-6027
www.state.in.us/idem

February 17, 2004

Mr. George Hertsel
Cooper - Standard Automotive, Inc.
207 South West Street
Auburn, Indiana 46706

Re: Significant Source Modification No:
033-17701-00013

Dear Mr. Hertsel:

Cooper - Standard Automotive, Inc. applied for a Part 70 operating permit on July 9, 1996 for a mixed rubber and molded rubber products manufacturing source. An application to modify the source was received on July 26, 2002. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

New Coating Operations (GR-05)

(a) One (1) chain-on-edge line, identified as COE #7, with a unit ID of 324, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) booths, with particulate emissions controlled by fabric filters, and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

(b) One (1) chain-on-edge line, identified as COE #8, with a unit ID of 325, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) booths, with particulate emissions controlled by fabric filters, and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

(c) One (1) rotary line, with a unit ID of 326, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) booths, with particulate emissions controlled by fabric filters; and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

(d) One (1) dip line, identified as Dip Line #3, with a unit ID of 323, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) dip tanks; and

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(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.6 million British thermal units per hour.

Insignificant Activities

(a) Activities with emission equal to or less the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO2, NOx, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:

(1) One (1) wheelaborator, identified as Wheelabrator #2, with a unit ID of 327. [326 IAC 6-3-2].

(2) One (1) phosphate line, identified as Prosphate Line #2.

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Pring, ERG, Morrisville, North Carolina 27560, or call (919) 468-7840 to speak directly to Mr. Pring. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ERG/MP

cc: File - DeKalb County
U.S. EPA, Region V
DeKalb County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Ampil
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner

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PART 70 SIGNIFICANT SOURCE MODIFICATION AND MAJOR MODIFICATION UNDER PREVENTION OF SIGNIFICANT DETERIORATION

OFFICE OF AIR QUALITY

Cooper - Standard Automotive, Inc.
207 South West Street
Auburn, Indiana 46706

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 033-17701-00013	
Issued by: original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: **February 17, 2004**

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SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary custom mixing and miscellaneous metal and plastic parts and products plant.

Responsible Official:	Plant Manager
Source Address:	207 South West Street, Auburn, Indiana 46706
Mailing Address:	207 South West Street, Auburn, Indiana 46706
General Source Phone Number:	(260) 925-0700
SIC Code:	3061
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

New Coating Operations (GR-05)

(a) One (1) chain-on-edge line, identified as COE #7, with a unit ID of 324, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) booths, with particulate emissions controlled by fabric filters, and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

(b) One (1) chain-on-edge line, identified as COE #8, with a unit ID of 325, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) booths, with particulate emissions controlled by fabric filters, and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

(c) One (1) rotary line, with a unit ID of 326, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) booths, with particulate emissions controlled by fabric filters; and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

(d) One (1) dip line, identified as Dip Line #3, with a unit ID of 323, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) dip tanks; and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.6 million British thermal units per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This modification also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21), which do not have any applicable requirements:

(a) Activities with emission equal to or less the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO2, NOx, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:

(1) One (1) wheelaborator, identified as Wheelabrator #2, with a unit ID of 327. [326 IAC 6-3-2].

(2) One (1) phosphate line, identified as Prosphate Line #2.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

It is a major source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [40 CFR 124]

Pursuant to 40 CFR 124.15, 40 CFR 124.19, and 40 CFR 124.20, since no comments were received during the public comment period, this permit becomes effective upon its issuance.

B.3 Revocation of Permits [40 CFR 52.21(r)(2)] [326 IAC 2-2-8]

Pursuant to 40 CFR 52.21(r)(2) and 326 IAC 2-2-8(a)(1), this permit to construct shall become invalid if construction is not commenced within eighteen (18) months after receipt of this approval, if construction is discontinued for a period of eighteen (18) months or more, or if construction is not completed within a reasonable time. IDEM may extend the eighteen (18) month period upon satisfactory showing that an extension is justified.

B.4 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application or the permit. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emissions units differs from the construction proposed in the application or the permit in a manner that is regulated under the provisions of 326 IAC 2-2, the source may not begin operation until the source modification has been revised pursuant to the provisions of 326 IAC 2-2 and the provisions of 326 IAC 2-1.1-6 and an Operation Permit Validation Letter is issued.

(c) If actual construction of the emissions units differs from the construction proposed in the application or the permit in a manner that is not regulated under the provisions of 326 IAC 2-2, the source may not begin operation until the source modification has been revised pursuant to the provisions of 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.

(d) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(e) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

(f) In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

(1) If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Part 70 draft.

(2) If the Part 70 permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Part 70 permit at the time of issuance.

(3) If the Part 70 permit has gone through public notice, but has not gone through final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will issued after EPA review.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are

available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.10 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northern Regional Office
Telephone Number: 1-800-753-5519 or 219-245-4870
Facsimile Number: 219-245-4877

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

[326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.13 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.14 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: New Coating Operations (GR-05)

New Coating Operations (GR-05)

(a) One (1) chain-on-edge line, identified as COE #7, with a unit ID of 324, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) booths, with particulate emissions controlled by fabric filters, and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

(b) One (1) chain-on-edge line, identified as COE #8, with a unit ID of 325, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) booths, with particulate emissions controlled by fabric filters, and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

(c) One (1) rotary line, with a unit ID of 326, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) booths, with particulate emissions controlled by fabric filters; and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

(d) One (1) dip line, identified as Dip Line #3, with a unit ID of 323, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) dip tanks; and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.6 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21] [326 IAC 8-1-6]

Pursuant to 326 IAC 2-2-3 (Prevention of Significant Deterioration), the Permittee shall comply with the following limitations:

(a) VOC emissions from COE#7 (Unit ID 324), COE#8 (Unit ID 325), the rotary line (unit 326), and Dip Line #3 (Unit ID 323) shall each be controlled by a regenerative thermal oxidizer, and the Permittee shall operate the control devices in accordance with manufacturer's specifications. The overall efficiency of the thermal oxidizers shall be greater than eighty-one (81) percent.

(b) The total amount of VOC delivered to the coating facilities described in Section D.1 shall be limited to less than 1,132 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit in conjunction with condition D.1.1(a) limits the potential to emit VOC from the coating facilities to less than 268 tons per year.

D.1.2 VOC Control [326 IAC 2-2-3] [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the Permittee shall operate the following overspray controls on COE#7, COE#8, and the Rotary Line.

(1) Programmable Logic Controls (PLC);

(2) Part fixture sensing; and

(3) HVLP spray guns.

(b) Pursuant to 326 IAC 2-2-3 and 326 IAC 8-1-6, the Permittee shall operate chain indexing on COE#7 and COE#8.

D.1.3 Particulate Matter (PM) 40 CFR Part 52, Subpart P

Pursuant to 40 CFR 52 Subpart P, the PM from COE#7, COE#8, and the Rotary Line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations shall be controlled by overspray filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1-1, apply to the affected source except when otherwise specified by Table 2 to 40 CFR 63, Subpart MMMM. The Permittee shall comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.

(b) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(c) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 2-2-3]

Pursuant to 326 IAC 2-2-3, the Permittee shall operate the thermal oxidizer to achieve compliance with condition D.1.1.

D.1.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiency as per condition D.1.1 for each thermal oxidizer utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.10 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1400^0F, or at the temperature specified by the equipment manufacturer.

(b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1(a), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature as observed during the compliant stack test.

D.1.11 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1, as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are

available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.12 Monitoring

(a) Daily inspections shall be performed to verify placement, integrity and particle loading of the filters. To monitor the performance of the overspray filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of each of the adhesive/coating operations emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an overspray emission, or evidence of overspray emission. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.13 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount and VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month and the amount of VOC disposed of.

(4) The weight of VOCs emitted for each compliance period.

(5) The continuous temperature records (on a hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.

(6) Daily records of the duct pressure or fan amperage.

(b) To document compliance with Condition D.1.12, the Permittee shall maintain a log of daily overspray observations, and daily and weekly inspections.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

D.1.14 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart MMMM.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.15 Reporting Requirements

(a) A quarterly report of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as deemed by 326 IAC 2-7-1(34).

D.1.16 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the notification of compliance status in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient to IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart MMMM.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permit Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West Street, Auburn, Indiana 46706
Mailing Address: 207 South West Street, Auburn, Indiana 46706
Source Modification No.: 033-15942-00013

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Source Modification Quarterly Report

Source Name: Cooper - Standard Automotive, Inc.
Source Address: 207 South West Street, Auburn, Indiana 46706
Mailing Address: 207 South West Street, Auburn, Indiana 46706
Source Modification No.: 033-17701-00013
Facility: COE#7, COE#8, Rotary Line, Dip Line #3
Parameter: VOC
Limit: Input of VOC to COE#7, COE#8, Rotary Line, Dip Line #3 shall not exceed 4,417 tons combined, per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Issued February 17, 2004

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Part 70 Significant Source Modification and
Major Modification Under Prevention of Significant Deterioration

Source Background and Description

Source Name:	Cooper - Standard Automotive, Inc.
Source Location:	207 South West Street, Auburn, Indiana 46706
County:	DeKalb
SIC Code:	3061
Operation Permit No.:	T033-6253-00013
Operation Permit Issuance Date:	Pending
Significant Source Modification No.:	SSM033-17701-00013
Permit Reviewer:	ERG/MP

The Office of Air Quality (OAQ) has reviewed a modification application from Cooper - Standard Automotive, Inc. relating to the construction of the following emission units and pollution control devices:

New Coating Operations (GR-05)

(a) One (1) chain-on-edge line, identified as COE #7, with a unit ID of 324, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) booths, with particulate emissions controlled by fabric filters, and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

(b) One (1) chain-on-edge line, identified as COE #8, with a unit ID of 325, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) booths, with particulate emissions controlled by fabric filters, and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

(c) One (1) rotary line, with a unit ID of 326, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) booths, with particulate emissions controlled by fabric filters; and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.5 million British thermal units per hour.

(d) One (1) dip line, identified as Dip Line #3, with a unit ID of 323, controlled by a thermal oxidizer, and consisting of the following:

(1) Two (2) dip tanks; and

(2) Two (2) natural gas-fired ovens, each with a maximum capacity of 0.6 million British thermal units per hour.

Note that the maximum throughput associated with each new coating line is based on the worst-case currently known 'jobs' and coating transfer efficiencies as of this date. The maximum capacity has the potential to increase or decrease depending on future customer 'jobs.'

Insignificant Activities

(a) Activities with emission equal to or less the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO2, NOx, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:

(1) One (1) wheelaborator, identified as Wheelabrator #2, with a unit ID of 327. [326 IAC 6-3-2].

(2) One (1) phosphate line, identified as Prosphate Line #2.

Note that this construction is considered one project for all applicability purposes with the injection molding units permitted in PSD Significant Source Modification 033-15942-00013. The modification can be split up between two permits because each permit meets all the PSD requirements that a single PSD permit would have.

History

On July 26, 2002, Cooper - Standard Automotive, Inc. submitted an application to the OAQ requesting to add two (2) chain-on-edge lines (COE #7 and COE #8), one (1) rotary line, one (1) dip line (Dip Line #3), and eighteen (18) rubber injection molding presses. Cooper - Standard Automotive, Inc., submitted a Part 70 permit application on July 9, 1996. The Part 70 permit, T033-6253-00013 has not been issued yet. This modification to an existing PSD major source is major because the potential to emit VOC is greater than the thresholds specified in 326 IAC 2-2-1(w).

The modification has been split up into two (2) permits: one (1) for the construction of the eighteen (18) rubber injection molding presses and associated grinding operations (Unit ID 600); and one (1) for the construction of the two (2) chain-on-edge lines (COE #7 and COE #8), one (1) rotary line, and one (1) dip line (Dip Line #3). The construction of all of these units combined will be considered one (1) project with respect to all rule applicability determinations as they are being performed within a short period of time. The construction is being split into two (2) separate permits for administrative purposes only. The source requested that the construction of the eighteen (18) rubber injection molding presses and associated grinding operations (Unit ID 600) be placed in a permit by themselves because the source had a greater need to begin construction on those presses as soon as possible. The modification can be split up between two permits because each permits meets all the PSD requirements that a single PSD permit would have.

Enforcement Issue

(a) IDEM is aware that COE #2 was constructed after the finalization of the PSD rules and should have undergone a PSD review in 1981.

(b) IDEM is reviewing this matter and will take appropriate action. In addition, IDEM is reviewing other issues that are discussed in the Title V permit (033-6253-00013) Technical Support Document. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Stack Summary

The initial design of the equipment covered by this permit called for separate stacks for the booths and drying ovens. However, since submitting the original application, the facility has agreed to utilize thermal oxidation to control VOC emissions and the final stack parameters have not been determined.

Recommendation

The staff recommends to the Commissioner that the Part 70 PSD Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 26, 2002.

No notice of completeness was mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 7). Since the construction of the injection molding presses and associated grinding operators (Unit ID 600) is considered one (1) project, for all rule applicability determinations, with the construction of the chain-on-edge lines, rotary line, and dip line, the calculations show the emissions from all units included in the complete project.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls of the complete modification including the equipment in this permit (17701) and the previous permit (15942). Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	58.52
PM-10	58.52
SO_2	0.01
VOC	1,205.04
CO	1.4

Pollutant	Potential To Emit (tons/year)
NO_x	1.66

HAP's	Potential To Emit (tons/year)
1,1,1-Trichloroethane	0.14
1,1-Dichloroethene	0.02
1,3-Butadiene	0.09
2–Butanone	0.09
2-Chlror-1,3-Butadiene	0.08
4-Methyl-2-Pentanone	5.48
Acetaldehyde	0.06
Acetonitrile	0.05
Acetophenone	0.01
Acylonitrile	0.01
Aniline	9.33
Benzene	0.42
Benzidine	0.04
Bis(2-Ethylhexyl)phthalate	0.11
Carbon Disulfide	5.01
Carbon Tetrachloride	0.79
Carbonyl Sulfide	4.01
Chloroform	0.22
Chloromethane	0.06
o-Cresol	0.94
Chromium	21.38
Cumene	0.02
Di-n-butylphthalate	0.09
Ethylbenzene	65.88
Formaldehyde	1.73
Glycol Ethers	10.34
Hexane	0.29
Isoocatane	0.04
Lead	0.38
Manganese	0.42
Methylene Chloride	0.45
MEK	9.05
MIBK	447.56
Naphthalene	0.02
o-Toluidine	0.04
Phenol	7.51
Propylene Oxide	0.33
Selenium	7.31
Styrene	0.76
t-Butyl Methyl Ether	0.06
Tetrachloroethene	0.02
Toluene	574.68
Xylenes	333.28
TOTAL	1,508.60

Note: These individual HAP emissions are the worst case individual HAPs from

a group of worst case rubber compounds and coatings. This is why the total HAPs exceed the VOC emissions listed in the previous table.

Justification for Modification

The Part 70 source is being modified through a PSD Part 70 Significant Source Modification. The modification is comprised of eighteen (18) rubber injection molding presses and associated grinding operations (Unit ID 600), two (2) chain-on-edge lines, one (1) rotary line, and one (1) dip line. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4) as the potential to emit of VOC from the entire modification is greater than twenty-five (25) tons per year and pursuant to 326 IAC 2-7-10.5(f)(6) as the potential to emit a single HAP from the entire modification is greater than ten (10) tons per year and the potential to emit any combination of HAPs from the entire modification is greater than twenty-five (25) tons per year.

County Attainment Status

The source is located in DeKalb County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) DeKalb County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	12.1
PM-10	12.1
SO_2	40.1

Pollutant	Emissions (tons/year)
VOC	>250
CO	26.3
NOx	39.3

(a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions are based upon the TSD for T033-6253-00013, which is not yet issued.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification. This table displays the potential to emit of the entire modification, including the injection molding presses, as the emissions from the entire modification are looked at for rule applicability determinations.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Combined HAPs
18 Rubber Injection Molding Presses (Unit ID 400) and associated grinding (Unit ID 600)	1.14	1.14	0	56.9[4]	0	0	27.29[4,5]
Dip Line #3 (Unit 323), COE #7 (Unit 324), COE #8 (Unit 325), Rotary Line (Unit 326)	5.73[2]	5.73[2]	0	Less than 68[1]	0	0	Less than 265[1]
Combustion Sources[3]	0.13	0.13	0.01	0.09	1.40	1.66	Neg
Total	7.00	7.00	0.01	124.99	1.40	1.66	292.29
PSD Threshold Level	25	15	40	40	100	40	---

1 This limit is the combined limit for the equipment being added as part of this permit (Dip Line #3, COE #7, COE#8, and Rotary Line).

2 This value shows the potential to emit after the fabric filters for COE #7, COE #8, and Rotary Line. The fabric filters are required to control emissions from COE #7, COE #8, and the Rotary Line at all times that COE #7, COE #8, and the Rotary Line are in operation in order to render the emissions from the entire modification less than fifteen (15) tons of PM10 per year and less than twenty-five (25) tons of PM per year.

3 Combustion emissions are from the natural gas ovens on the new coating lines (Dip Line #3, COE #7, COE #8, and Rotary Line).

4 Note that the 27.29 tons per year of HAPs is based on the sum of the worst case individual HAPs. Therefore the sum of the HAPs exceeds the HAPs expected to be emitted when processing any single rubber compound.

5 Note that these units, in combination with the 47 existing transfer and injection molding presses, are subject to a rubber throughput limit and a Rubber Compound #17 throughput limit. The 18 new presses and the 47 existing presses shall not process greater than 42,000,000 pounds of rubber, combined, per 12 consecutive month period. The 18 new presses shall not process greater than 15,811,800 pounds of Rubber Compound #17, combined, per 12 consecutive month period. The VOC emissions shall not exceed 6.23×10^{-3} pounds per pound rubber and the aniline emissions shall not exceed 1.02×10^{-3}

pounds per pound rubber. These limits are equivalent to VOC emissions less than 131 tons of VOC per year from the 18 new presses and 47 existing presses, combined, and aniline emissions less than 0.23 grams per second from the 18 new presses. These equipment are permitted in permit PSD SSM 033-15942-00013.

This modification to an existing major stationary source is major because the emissions increase for VOC is more than the PSD significant thresholds. Therefore, pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) the PSD requirements apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) The new coating lines are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) because the source uses over 250 gallons per year of coatings containing HAP and is a major source of HAPs. The source has not chosen the method of compliance yet.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the coating lines except when otherwise specified by 40 CFR 63, Subpart MMMM.

Pursuant to this rule, the Permittee must comply with Subpart MMMM on and after the date 3 years after the effective date of Subpart MMMM, or accept and meet an enforcement HAP emissions limit below the major source threhold prior to this date. The Permittee must submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) one (1) year after the effective date of Subpart MMMM. The Permittee must submit an application for a significant permit modification no later than the date that the Notification of Compliance Status, specified in 40 CFR 63.9(h), is submitted. This date is based on the method of compliance chosen.

The new coating lines are also subject to 40 CFR 63, Subpart PPPP (Plastic Parts Surface Coating). Compliance with this rule will be demonstrated by compliance with 40 CFR 63, Subpart MMMM.

(c) This modification is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring (CAM) as these units are subject to 40 CFR, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products).

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

This source was constructed prior to the PSD rules and was an existing major source upon finalization of the PSD rules. This source is not considered to be in one (1) of the twenty-eight listed source categories. The following units were constructed prior to the PSD rules: COE #1, Ronci Line, Auto Line #1, Dip Line #1, and Hand Line. Dip Line #1 has since been removed.

COE #2 was constructed in 1981 and should have undergone a PSD BACT review. The BACT analysis and accompanying requirements will be included in the Title V permit.

COE #3 was constructed in 1985 and limits were accepted to avoid 326 IAC 2-2 and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements). In 1986, these limits were increased to above 326 IAC 8-1-6 thresholds, but below 326 IAC 2-2 thresholds. Therefore, 326 IAC 8-1-6 BACT was

applied. In 1991, the VOC limits were increased to above 326 IAC 2-2 thresholds, but COE #3 netted out of PSD review.

In 1988, COE #4, COE #5, and ID/OD were constructed. Emissions from these units were limited to less than 326 IAC 2-2 and 326 IAC 8-1-6 thresholds in order to render the requirements of these regulations not applicable. In 1991 these limits were increased to above 326 IAC 8-1-6 thresholds and COE #4 and COE #5 were reviewed under 326 IAC 8-1-6 BACT. The source claimed that even though the limits were increased at this time to above PSD thresholds, they netted out of PSD due to the shut down of other units. During the Part 70 permit application process, the source stated that the BACT requirements from 1991 for these units were not compatible with their process. Also, in review of the application, it was determined that the 1991 source modification for COE #3, COE #4, and COE #5 should have triggered PSD for these units and ID/OD #1 which had originally been issued a limit in conjunction with COE #4. As a result the source submitted a PSD BACT analysis in 2001. The new BACT analysis and accompanying requirements will be included in T033-6253-00013.

COE #6 was constructed in 1991 and permitted as a PSD minor source. At this time, 326 IAC 8-1-6 BACT applied. As part of the Part 70 permitting process, an updated BACT analysis for this unit was submitted. The new BACT analysis and accompanying requirements will be included in T033-6253-00013.

In 1999, Auto Line #2 and curing autoclave were constructed. Emissions from both units were limited to render the requirements of 326 IAC 2-2 not applicable.

In 2000, Dip Line #2 was constructed and permitted as an exempt operation.

In 2002, the source received a source modification, 033-14752-00013, to construct three (3) injection molding presses and one (1) transfer molding press. Note that to this date, only the three (3) injection molding presses have been constructed and the source has no intentions of constructing the one (1) transfer molding press. The source accepted limits on this modification to render the requirements of 326 IAC 2-2 not applicable.

The construction of the eighteen (18) injection molding presses (Unit 400) and associated grinding operations (Unit ID 600), (included in SSM 033-15942-00013), and the construction of the Dip Line #3 (Unit 323), COE #7 (Unit 324), COE #8 (Unit 325), and Rotary Line (Unit 326), (included in this permit) are subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because the modification to an existing major stationary source has the potential to emit greater than the PSD applicability level of forty (40) tons per year for VOC. The potential to emit of PM and PM10 from the entire modification is limited to less than twenty-five (25) and fifteen (15) tons per year, respectively, by this permit which requires that the fabric filters for PM and PM10 control be in operation and control emissions from Dip Line #3, COE #7, COE #8, and Rotary Line at all times that these lines are in operation.

Pursuant to 326 IAC 2-2-3, the source conducted a BACT analysis and submitted a PSD permit application on July 26, 2002, for a Significant Source Modification to permit the construction and operation of the new coating operations. See Appendix B for a complete review of the BACT analysis.

Pursuant to 326 IAC 2-2-4, the source completed an Ambient Ozone Impact Analysis which indicates that emissions from the proposed modification do not have a significant impact on the air quality of the surrounding area.

326 IAC 2-4.1 (Hazardous Air Pollutants)

The construction of the Dip Line #3 (Unit 323), COE #7 (Unit 324), COE #8 (Unit 325), and Rotary Line (Unit 326), is not subject to the requirements of 326 IAC 2-4.1 (Hazardous Air Pollutants) because 326 IAC 2-4.1 only applies to the construction of a new or reconstructed "process or production unit." A "process or production unit" is defined as "any collection of structures and/or equipment, that processes, assembles, applies, or otherwise uses material inputs to produce or store an intermediate or final product. A single facility may contain more than one process or production unit." The new units that are part of this modification do not constitute a "process or production unit" because they cannot, by themselves or as a group, produce a product or intermediate. The existing "process or production lines" will not be considered reconstructed because less than fifty percent (50%) of the fixed capital cost of a comparable entirely new emissions unit will not be spent. Also the NESHAP, 40 CFR 63, Subparts PPPP and MMMM were recently signed. Therefore, a NESHAP applies to these units and 326 IAC 2-4.1 is not applicable.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from COE #7, COE #8, and the rotary line shall be limited to the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Under the rule revision, particulate from the surface coating shall be controlled by a dry particulate filter or baffle and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) There are no particulate emissions expected from the dip coating line (DIP Line #3), therefore, this rule does not apply to this unit.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The construction of the (two (2) chain-on-edge lines, one (1) rotary line, one (1) dip line, is subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds) because this operation has the potential to emit greater than twenty-five (25) tons per year VOC. Pursuant to 326 IAC 8-1-6, the construction of these units must reduce VOC emissions using the Best Available Control Technology (BACT). This requirement will be satisfied by complying with 326 IAC 2-2-3 (Prevention of Significant Deterioration). IDEM determined that installing and operating a thermal oxidizer on the coating operation is representative of BACT. See Appendix B for a complete review of the BACT analysis.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This modification is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because these are new units that were not constructed after October 7, 1974 and prior to January 1, 1980.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This modification is not subject to 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) because the source is not located in Lake, Porter, Clark, or Floyd County.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

(a) Daily inspections shall be performed to verify placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of each of the adhesive/coating operations emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an overspray emission, or evidence of overspray emission. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with

Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 033-17701-00013.

Appendix A: Emission Calculations
Curing Operation (Unit 400) (GR-04) - VOC and HAP Emissions
Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SSM033-17701-00013
Plt ID: 033-00013
Reviewer: ERG/MP
Date: 11/10/03

Combined Curing Operation (Unit 400) - VOC and HAP

Total Potential Throughput = 68,783,520 lb rubber/yr [68,783,520 = (116*18*8760)+(5764*8760)]
Total Limited Throughput = 42,000,000 lb rubber/yr

Chemical Name	CAS #	Emission Factor (lb/lb rubber)	Maximum Emissions (ton/yr)	Limited Emissions (ton/yr)
Total VOC		**6.23E-03**	**214.26**	**130.83**
1,1,1-Trichloroethane	71-55-6	1.51E-05	0.52	0.32
1,1-Dichloroethene	75-35-4	1.96E-06	0.07	0.04
1,2,4-Trichlorobenzene	120-82-1	1.66E-08	0.00	0.00
1,3-Butadiene	106-99-0	9.42E-06	0.32	0.20
1,4-Dichlorobenzene	106-46-7	5.42E-08	0.00	0.00
2-Butanone	78-93-3	9.92E-06	0.34	0.21
2-Chloro-1,3-Butadiene	126-99-8	9.08E-06	0.31	0.19
2-Methylphenol	95-48-7	1.17E-07	0.00	0.00
4-Methyl-2-Pentanone	108-10-1	5.99E-04	20.60	12.58
Acetaldehyde	75-07-0	6.69E-06	0.23	0.14
Acetonitrile	75-05-8	5.47E-06	0.19	0.11
Acetophenone	98-86-2	1.50E-06	0.05	0.03
Acrylonitrile	107-13-1	1.33E-06	0.05	0.03
Aniline	62-53-3	1.02E-03	35.08	21.42
Benzene	71-43-2	1.06E-06	0.04	0.02
Benzidine	92-87-5	4.53E-06	0.16	0.10
Biphenyl	92-52-4	3.06E-07	0.01	0.01
bis(2-Ethylhexyl)phthalate	117-81-7	1.15E-05	0.40	0.24
Carbon Disulfide	75-15-0	5.48E-04	18.85	11.51
Carbonyl Sulfide	463-58-1	4.39E-04	15.10	9.22
Chloromethane	74-87-3	6.36E-06	0.22	0.13
Cumene	98-82-8	1.89E-06	0.07	0.04
Di-n-butylphthalate	84-74-2	9.64E-06	0.33	0.20
Dibenzofuran	132-64-9	6.46E-08	0.00	0.00
Dimethylphthalate	131-11-3	1.80E-07	0.01	0.00
Ethylbenzene	100-41-4	4.75E-06	0.16	0.10
Hexane	110-54-3	3.12E-05	1.07	0.66
Isooctane	540-84-1	4.81E-06	0.17	0.10
m-Xylene + p-Xylene		1.22E-05	0.42	0.26
Methylene Chloride	75-09-2	4.87E-05	1.67	1.02
Naphthalene	91-20-3	2.37E-06	0.08	0.05
o-Toluidine	95-53-4	4.36E-06	0.15	0.09
o-Xylene	95-47-6	1.86E-05	0.64	0.39
Phenol	108-95-2	9.68E-07	0.03	0.02
Propylene Oxide	75-56-9	3.63E-05	1.25	0.76
Styrene	100-42-5	8.31E-05	2.86	1.75
t-Butyl Methyl Ether	1634-04-4	6.36E-06	0.22	0.13
Tetracloroethene	127-18-4	1.98E-06	0.07	0.04
Toluene	108-88-3	2.57E-05	0.88	0.54
Total HAP			**102.61**	**62.66**

METHODOLOGY
Emissions (ton/yr) = Emission Factor (lb/lb rubber) * Throughput (lb rubber/yr) / 2000 (lb/ton)

Appendix A: Emission Calculations
Curing Operation (Unit 400) (GR-04) - VOC and HAP Emissions
Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SSM033-17701-00013
Plt ID: 033-00013
Reviewer: ERG/MP
Date: 11/10/03

Curing Operation (Unit 400) - 18 new presses - VOC and HAP

Total Potential Throughput = 18,290,880 lb rubber/yr [18,290,880 = 116*18*8760]

Chemical Name	CAS #	Emission Factor (lb/lb rubber)	Potential Emissions (ton/yr)
Particulate			**1.14**
Total VOC		**6.23E-03**	**56.98**
1,1,1-Trichloroethane	71-55-6	1.51E-05	0.14
1,1-Dichloroethene	75-35-4	1.96E-06	0.02
1,2,4-Trichlorobenzene	120-82-1	1.66E-08	0.00
1,3-Butadiene	106-99-0	9.42E-06	0.09
1,4-Dichlorobenzene	106-46-7	5.42E-08	0.00
2-Butanone	78-93-3	9.92E-06	0.09
2-Chloro-1,3-Butadiene	126-99-8	9.08E-06	0.08
2-Methylphenol	95-48-7	1.17E-07	0.00
4-Methyl-2-Pentanone	108-10-1	5.99E-04	5.48
Acetaldehyde	75-07-0	6.69E-06	0.06
Acetonitrile	75-05-8	5.47E-06	0.05
Acetophenone	98-86-2	1.50E-06	0.01
Acrylonitrile	107-13-1	1.33E-06	0.01
Aniline	62-53-3	1.02E-03	9.33
Benzene	71-43-2	1.06E-06	0.01
Benzidine	92-87-5	4.53E-06	0.04
Biphenyl	92-52-4	3.06E-07	0.00
bis(2-Ethylhexyl)phthalate	117-81-7	1.15E-05	0.11
Carbon Disulfide	75-15-0	5.48E-04	5.01
Carbonyl Sulfide	463-58-1	4.39E-04	4.01
Chloromethane	74-87-3	6.36E-06	0.06
Cumene	98-82-8	1.89E-06	0.02
Di-n-butylphthalate	84-74-2	9.64E-06	0.09
Dibenzofuran	132-64-9	6.46E-08	0.00
Dimethylphthalate	131-11-3	1.80E-07	0.00
Ethylbenzene	100-41-4	4.75E-06	0.04
Hexane	110-54-3	3.12E-05	0.29
Isooctane	540-84-1	4.81E-06	0.04
m-Xylene + p-Xylene		1.22E-05	0.11
Methylene Chloride	75-09-2	4.87E-05	0.45
Naphthalene	91-20-3	2.37E-06	0.02
o-Toluidine	95-53-4	4.36E-06	0.04
o-Xylene	95-47-6	1.86E-05	0.17
Phenol	108-95-2	9.68E-07	0.01
Propylene Oxide	75-56-9	3.63E-05	0.33
Styrene	100-42-5	8.31E-05	0.76
t-Butyl Methyl Ether	1634-04-4	6.36E-06	0.06
Tetracloroethene	127-18-4	1.98E-06	0.02
Toluene	108-88-3	2.57E-05	0.24
Total HAP			**27.29**

METHODOLOGY: Emissions (ton/yr) = Emission Factor (lb/lb rubber) * Throughput (lb rubber/yr) / 2000 (lb/ton)

Limited Aniline Emissions

Compound #17 Throughput (lb/yr)	Compound #17 Aniline	Aniline Emissions*	Aniline Emissions*	Aniline Emissions
15,811,800	1.02E-03	1.84	8.04	0.23

*Emissions include aniline emissions from the other rubber compounds in addition to the emissions from Compound #17.
Note that as the aniline emissions from Compound #17 are the worst-case, only the Compound #17 emission factor was used to determine the emissions of aniline (g/s).

Appendix A: Emission Calculations
Coating Operation Emissions (GR-05) - VOC Emissions
Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SSM033-17701-00013
Plt ID: 033-00013
Reviewer: ERG/MP
Date: 11/10/03

Dip Line #3 (Unit 323)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
7326 - Primer	7.38	82.90%	0%	82.9%	0.00%	8.77%	0.00194	1800	6.12	6.12	21.38	513.20	93.66	0.00	69.76	100%
7329 - Primer	7.45	82.90%	0%	82.9%	0.00%	Unknown	0.00194	1800	6.18	6.18	21.59	518.07	**94.55**	0.00	NA	100%
7360 - Adhesive	7.67	86.60%	0%	86.6%	0.00%	Unknown	0.00260	1800	6.64	6.64	31.05	745.31	**136.02**	0.00	NA	100%
7678 - Adhesive	8.00	81.20%	0%	81.2%	0.00%	10.86%	0.00260	1800	6.50	6.50	30.37	728.90	133.02	0.00	59.82	100%
Worst Case Combination of Primer and Adhesive													*230.57*	*0.00*		

COE #7 (Unit 324)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Coating Board Efficiency (%)	Fabric Filter Control Efficiency (%)	Controlled Particulate Emissions (ton/yr)	lb VOC/gal solids
7326 - Primer	7.38	82.90%	0%	82.9%	0.0%	8.77%	0.00253	1800	6.12	6.12	27.81	667.42	121.80	5.02	75%	90%	0.50	69.76
7329 - Primer	7.45	82.90%	0%	82.9%	0.0%	Unknown	0.00253	1800	6.18	6.18	28.07	673.75	122.96	5.07	75%	90%	0.51	NA
7362 - Primer	7.67	84.40%	0%	84.4%	0.0%	Unknown	0.00253	1800	6.47	6.47	29.42	706.20	**128.88**	4.76	75%	90%	0.48	NA
7655 - Primer	9.60	67.70%	65%	3.0%	74.4%	21.80%	0.00253	1800	1.13	0.29	1.31	31.42	5.73	**12.35**	75%	90%	**1.23**	1.32
7335 - Top Coat	9.83	54.10%	0%	54.1%	0.0%	41.28%	0.00200	1800	5.32	5.32	19.14	459.48	83.85	14.23	75%	90%	1.42	12.88
7656 - Top Coat	10.83	51.60%	50%	1.6%	65.1%	32.70%	0.00200	1800	0.50	0.17	0.62	14.97	2.73	16.53	75%	90%	1.65	0.53
7360 - Adhesive	7.67	86.60%	0%	86.6%	0.0%	Unknown	0.00338	1800	6.64	6.64	40.39	969.41	**176.92**	5.48	75%	90%	0.55	NA
7642 - Adhesive	7.82	83.30%	0%	83.3%	0.0%	Unknown	0.00338	1800	6.51	6.51	39.61	950.70	173.50	6.96	75%	90%	0.70	NA
7682 - Adhesive	7.84	82.00%	0%	82.0%	0.0%	Unknown	0.00338	1800	6.43	6.43	39.09	938.26	171.23	7.52	75%	90%	0.75	NA
7678 - Adhesive	8.00	81.20%	0%	81.2%	0.0%	10.86%	0.00338	1800	6.50	6.50	39.50	948.06	173.02	**8.01**	75%	90%	**0.80**	59.82
Worst Case Combination of Primer and Adhesive or Worst Case Top Coat													*305.80*	*20.36*			*2.04*	

COE #8 (Unit 325)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Coating Board Efficiency (%)	Fabric Filter Control Efficiency (%)	Controlled Particulate Emissions (ton/yr)	lb VOC/gal solids
7326 - Primer	7.38	82.90%	0%	82.9%	0.0%	8.77%	0.00253	1800	6.12	6.12	27.81	667.42	121.80	5.02	75%	90%	0.50	69.76
7329 - Primer	7.45	82.90%	0%	82.9%	0.0%	Unknown	0.00253	1800	6.18	6.18	28.07	673.75	122.96	5.07	75%	90%	0.51	NA
7362 - Primer	7.67	84.40%	0%	84.4%	0.0%	Unknown	0.00253	1800	6.47	6.47	29.42	706.20	**128.88**	4.76	75%	90%	0.48	NA
7335 - Top Coat	9.83	54.10%	0%	54.1%	0.0%	41.28%	0.00200	1800	5.32	5.32	19.14	459.48	83.85	14.23	75%	90%	1.42	12.88
7656 - Top Coat	10.83	51.60%	50%	1.6%	65.1%	32.70%	0.00200	1800	0.50	0.17	0.62	14.97	2.73	**16.53**	75%	90%	**1.65**	0.53
7360 - Adhesive	7.67	86.60%	0%	86.6%	0.0%	Unknown	0.00338	1800	6.64	6.64	40.39	969.41	**176.92**	5.48	75%	90%	0.55	NA
7642 - Adhesive	7.82	83.30%	0%	83.3%	0.0%	Unknown	0.00338	1800	6.51	6.51	39.61	950.70	173.50	6.96	75%	90%	0.70	NA
7682 - Adhesive	7.84	82.00%	0%	82.0%	0.0%	Unknown	0.00338	1800	6.43	6.43	39.09	938.26	171.23	7.52	75%	90%	0.75	NA
7678 - Adhesive	8.00	81.20%	0%	81.2%	0.0%	10.86%	0.00338	1800	6.50	6.50	39.50	948.06	173.02	8.01	75%	90%	0.80	59.82
Worst Case Combination of Primer and Adhesive or Worst Case Top Coat													*305.80*	*16.53*			*1.65*	

Coating Operation Emissions (GR-05) - VOC Emissions Continued

App

Rotary Line (Unit 326)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Coating Board Efficiency (%)	Fabric Filter Control Efficiency (%)	Controlled Particulate Emissions (ton/yr)	lb VOC/gal solids
7326 - Primer	7.38	82.90%	0%	82.9%	0.0%	8.77%	0.00253	1800	6.12	6.12	27.81	667.42	121.80	5.02	75%	90%	0.50	69.76
7329 - Primer	7.45	82.90%	0%	82.9%	0.0%	Unknown	0.00253	1800	6.18	6.18	28.07	673.75	122.96	5.07	75%	90%	0.51	NA
7362 - Primer	7.67	84.40%	0%	84.4%	0.0%	Unknown	0.00253	1800	6.47	6.47	29.42	706.20	**128.88**	4.76	75%	90%	0.48	NA
7655 - Primer	9.60	67.70%	65%	3.0%	74.4%	21.80%	0.00253	1800	1.13	0.29	1.31	31.42	5.73	**12.35**	75%	90%	**1.23**	NA
7335 - Top Coat	9.83	54.10%	0%	54.1%	0.0%	41.28%	0.00200	1800	5.32	5.32	19.14	459.48	83.85	14.23	75%	90%	1.42	12.88
7656 - Top Coat	10.83	51.60%	50%	1.6%	65.1%	32.70%	0.00200	1800	0.50	0.17	0.62	14.97	2.73	16.53	75%	90%	1.65	0.53
7360 - Adhesive	7.67	86.60%	0%	86.6%	0.0%	Unknown	0.00338	1800	6.64	6.64	40.39	969.41	**176.92**	5.48	75%	90%	0.55	NA
7642 - Adhesive	7.82	83.30%	0%	83.3%	0.0%	Unknown	0.00338	1800	6.51	6.51	39.61	950.70	173.50	6.96	75%	90%	0.70	NA
7682 - Adhesive	7.84	82.00%	0%	82.0%	0.0%	Unknown	0.00338	1800	6.43	6.43	39.09	938.26	171.23	7.52	75%	90%	0.75	NA
7678 - Adhesive	8.00	81.20%	0%	81.2%	0.0%	10.86%	0.00338	1800	6.50	6.50	39.50	948.06	173.02	**8.01**	75%	90%	**0.80**	59.82
Worst Case Combination of Primer and Adhesive or Worst Case Top Coat													*305.80*	*20.36*			*2.04*	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)*(1-Board Efficiency)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Transfer Efficiency and Board Efficiency
20%
20%
20%
20%
20%
20%
20%
20%
20%
20%

Transfer Efficiency
20%
20%
20%
20%
20%
20%
20%
20%
20%

Transfer Efficiency
20%
20%
20%
20%
20%
20%
20%
20%
20%
20%

Appendix A: Emission Calculations
Coating Operation Emissions (GR-05) - HAP Emissions
Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SSM033-17701-00013
Plt ID: 033-00013
Reviewer: ERG/MP
Date: 11/10/03

Dip Line #3 (Unit 323)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MIBK	Weight % o-Cresol	Weight % Phenol	Weight % MEK	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Carbon Tetrachloride	Weight % Lead	Weight % Benzene	Weight % Chloroform	Weight % Selenium	Formaldehyde Emissions (ton/yr)	MIBK Emissions (ton/yr)	o-Cresol Emissions (ton/yr)	Phenol Emissions (ton/yr)	MEK Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Carbon Tetrachloride Emissions (ton/yr)	Lead Emissions (ton/yr)	Benzene Emissions (ton/yr)	Chloroform Emissions (ton/yr)	Selenium Emissions (ton/yr)
7326 - Primer	7.38	0.0019	1800	0.09%	80.82%	0.17%	0.60%	1.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10	**91.31**	**0.19**	0.68	**1.85**	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7329 - Primer	7.45	0.0019	1800	0.07%	77.22%	0.00%	1.34%	0.00%	1.34%	4.69%	0.07%	0.07%	0.07%	0.00%	0.00%	0.00%	**0.08**	88.07	0.00	**1.53**	0.00	**1.53**	**5.35**	**0.08**	**0.08**	**0.08**	**0.00**	**0.00**	**0.00**
7360 - Adhesive	7.67	0.0026	1800	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.05%	0.05%	0.00%	**0.00**	**0.00**	**0.00**	**0.00**	2.50	19.15	**117.11**	**0.08**	**0.00**	**0.08**	**0.00**	0.00	0.00
7678 - Adhesive	8.00	0.0026	1800	0.00%	0.00%	0.00%	0.00%	0.00%	7.27%	38.20%	36.60%	0.00%	0.00%	0.00%	0.00%	0.91%	0.00	0.00	0.00	0.00	0.00	**11.90**	**62.58**	59.95	0.00	0.00	0.00	0.00	**1.49**
Worst Case Combination of Primer and Adhesive																	*0.08*	*91.31*	*0.19*	*1.53*	*1.85*	*13.43*	*67.93*	*117.18*	*0.16*	*0.08*	*0.08*	*0.00*	*1.49*

COE #7 (Unit 324)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MIBK	Weight % o-Cresol	Weight % Phenol	Weight % MEK	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Carbon Tetrachloride	Weight % Lead	Weight % Benzene	Weight % Chloroform	Weight % Selenium	Weight % Glycol Ethers	Weight % Chromium Compounds	Weight % Manganese Compounds	Formaldehyde (ton/yr)	MIBK (ton/yr)	o-Cresol (ton/yr)	Phenol (ton/yr)	MEK (ton/yr)	Ethyl Benzene (ton/yr)	Xylene (ton/yr)	Toluene (ton/yr)	Carbon Tetrachlroide (ton/yr)	Lead (ton/yr)	Benzene (ton/yr)	Chloroform (ton/yr)	Selenium (ton/yr)	Gylcol Ethers (ton/yr)	Chromium Compounds (ton/yr)	Manganese Compounds (ton/yr)
7326 - Primer	7.38	0.0025	1800	0.09%	80.82%	0.17%	0.60%	1.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.13	**118.75**	**0.25**	0.88	**2.40**	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**	**0.00**	0.00	0.00	0.00
7329 - Primer	7.45	0.0025	1800	0.07%	77.22%	0.00%	1.34%	0.00%	1.34%	4.69%	0.07%	0.07%	0.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10	114.53	0.00	**1.99**	0.00	**1.99**	**6.96**	**0.10**	**0.10**	**0.10**	**0.00**	0.00	0.00	0.00	0.00	0.00
7362 - Primer	7.67	0.0025	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7655 - Primer	9.60	0.0025	1800	0.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.60%	0.00%	0.00%	**0.76**	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**4.97**	0.00	0.00
7335 - Top Coat	9.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	5.74%	30.88%	18.52%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.59%	0.09%	0.00	0.00	0.00	0.00	0.00	8.90	47.86	28.71	0.00	0.00	0.00	0.00	0.00	0.00	**7.12**	**0.14**
7656 - Top Coat	10.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.23%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.40	0.00	0.00
7360 - Adhesive	7.67	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.05%	0.05%	0.00%	0.00%	0.00%	0.00%	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	3.25	24.90	**152.32**	**0.11**	**0.00**	**0.11**	**0.00**	0.00	**0.00**	0.00	0.00
7642 - Adhesive	7.82	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7682 - Adhesive	7.84	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	5.07%	20.28%	56.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	10.59	42.35	117.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7678 - Adhesive	8.00	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	7.27%	38.20%	36.60%	0.00%	0.00%	0.00%	0.00%	0.91%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	**15.48**	**81.40**	77.98	0.00	0.00	0.00	**1.94**	0.00	0.00	0.00	0.00
Worst Case Combination of Primer and Adhesive or Worst Case Top Coat																				*0.76*	*118.75*	*0.25*	*1.99*	*2.40*	*17.47*	*88.35*	*152.42*	*0.21*	*0.10*	*0.11*	*0.00*	*1.94*	*4.97*	*7.12*	*0.14*

COE #8 (Unit 325)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MIBK	Weight % o-Cresol	Weight % Phenol	Weight % MEK	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Carbon Tetrachloride	Weight % Lead	Weight % Benzene	Weight % Chloroform	Weight % Selenium	Weight % Glycol Ethers	Weight % Chromium Compounds	Weight % Manganese Compounds	Formaldehyde (ton/yr)	MIBK (ton/yr)	o-Cresol (ton/yr)	Phenol (ton/yr)	MEK (ton/yr)	Ethyl Benzene (ton/yr)	Xylene (ton/yr)	Toluene (ton/yr)	Carbon Tetrachlroide (ton/yr)	Lead (ton/yr)	Benzene (ton/yr)	Chloroform (ton/yr)	Selenium (ton/yr)	Gylcol Ethers (ton/yr)	Chromium Compounds (ton/yr)	Manganese Compounds (ton/yr)
7326 - Primer	7.38	0.0025	1800	0.09%	80.82%	0.17%	0.60%	1.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	**0.13**	**118.75**	**0.25**	0.88	**2.40**	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**	**0.00**	0.00	0.00	0.00
7329 - Primer	7.45	0.0025	1800	0.07%	77.22%	0.00%	1.34%	0.00%	1.34%	4.69%	0.07%	0.07%	0.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10	114.53	0.00	**1.99**	0.00	**1.99**	**6.96**	**0.10**	**0.10**	**0.10**	**0.00**	0.00	0.00	0.00	0.00	0.00
7362 - Primer	7.67	0.0025	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7335 - Top Coat	9.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	5.74%	30.88%	18.52%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.59%	0.09%	0.00	0.00	0.00	0.00	0.00	8.90	47.86	28.71	0.00	0.00	0.00	0.00	0.00	0.00	**7.12**	**0.14**
7656 - Top Coat	10.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.23%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.40**	0.00	0.00
7360 - Adhesive	7.67	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.05%	0.05%	0.00%	0.00%	0.00%	0.00%	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	3.25	24.90	**152.32**	**0.11**	**0.00**	**0.11**	**0.00**	0.00	0.00	0.00	0.00
7642 - Adhesive	7.82	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7682 - Adhesive	7.84	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	5.07%	20.28%	56.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	10.59	42.35	117.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7678 - Adhesive	8.00	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	7.27%	38.20%	36.60%	0.00%	0.00%	0.00%	0.00%	0.91%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	**15.48**	**81.40**	77.98	0.00	0.00	0.00	**1.94**	0.00	0.00	0.00	0.00
Worst Case Combination of Primer and Adhesive or Worst Case Top Coat																				*0.13*	*118.75*	*0.25*	*1.99*	*2.40*	*17.47*	*88.35*	*152.42*	*0.21*	*0.10*	*0.11*	*0.11*	*1.94*	*0.40*	*7.12*	*0.14*

Rotary Line (Unit 326)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MIBK	Weight % o-Cresol	Weight % Phenol	Weight % MEK	Weight % Ethyl Benzene	Weight % Xylene	Weight % Toluene	Weight % Carbon Tetrachloride	Weight % Lead	Weight % Benzene	Weight % Chloroform	Weight % Selenium	Weight % Glycol Ethers	Weight % Chromium Compounds	Weight % Manganese Compounds	Formaldehyde (ton/yr)	MIBK (ton/yr)	o-Cresol (ton/yr)	Phenol (ton/yr)	MEK (ton/yr)	Ethyl Benzene (ton/yr)	Xylene (ton/yr)	Toluene (ton/yr)	Carbon Tetrachlroide (ton/yr)	Lead (ton/yr)	Benzene (ton/yr)	Chloroform (ton/yr)	Selenium (ton/yr)	Gylcol Ethers (ton/yr)	Chromium Compounds (ton/yr)	Manganese Compounds (ton/yr)
7326 - Primer	7.38	0.0025	1800	0.09%	80.82%	0.17%	0.60%	1.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.13	**118.75**	**0.25**	0.88	**2.40**	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**	**0.00**	0.00	0.00	0.00
7329 - Primer	7.45	0.0025	1800	0.07%	77.22%	0.00%	1.34%	0.00%	1.34%	4.69%	0.07%	0.07%	0.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10	114.53	0.00	**1.99**	0.00	**1.99**	**6.96**	**0.10**	**0.10**	**0.10**	**0.00**	0.00	0.00	0.00	0.00	0.00
7362 - Primer	7.67	0.0025	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7655 - Primer	9.60	0.0025	1800	0.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.60%	0.00%	0.00%	**0.76**	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**4.97**	0.00	0.00
7335 - Top Coat	9.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	5.74%	30.88%	18.52%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.59%	0.09%	0.00	0.00	0.00	0.00	0.00	8.90	47.86	28.71	0.00	0.00	0.00	0.00	0.00	0.00	**7.12**	**0.14**
7656 - Top Coat	10.83	0.0020	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.23%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.40	0.00	0.00
7360 - Adhesive	7.67	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	1.59%	12.19%	74.56%	0.05%	0.00%	0.05%	0.05%	0.00%	0.00%	0.00%	0.00%	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	3.25	24.90	**152.32**	**0.11**	**0.00**	**0.11**	**0.00**	0.00	**0.00**	0.00	0.00
7642 - Adhesive	7.82	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7682 - Adhesive	7.84	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	5.07%	20.28%	56.13%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	10.59	42.35	117.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7678 - Adhesive	8.00	0.0034	1800	0.00%	0.00%	0.00%	0.00%	0.00%	7.27%	38.20%	36.60%	0.00%	0.00%	0.00%	0.00%	0.91%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	**15.48**	**81.40**	77.98	0.00	0.00	0.00	**1.94**	0.00	0.00	0.00	0.00
Worst Case Combination of Primer and Adhesive or Worst Case Top Coat																				*0.76*	*118.75*	*0.25*	*1.99*	*2.40*	*17.47*	*88.35*	*152.42*	*0.21*	*0.10*	*0.11*	*0.11*	*1.94*	*4.97*	*7.12*	*0.14*

Methodology
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: **Cooper - Standard Automotive, Inc.**
Address City IN Zip: **207 South West Street, Auburn, Indiana 46706**
Permit Number: **SSM033-17701-00013**
Plt ID: **033-00013**
Reviewer: **ERG/MP**
Date: **11/10/03**

Combined Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
3.8	33.3

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.13	0.13	0.01	1.66	0.09	1.40

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only
Company Name: Cooper - Standard Automotive, Inc.
Address City IN Zip: 207 South West Street, Auburn, Indiana 46706
Permit Number: SSM033-17701-00013
Plt ID: 033-00013
Reviewer: ERG/MP
Date: 11/10/03

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.495E-05	1.997E-05	1.248E-03	2.996E-02	5.659E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	8.322E-06	1.831E-05	2.330E-05	6.325E-06	3.495E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.